

NPDES COMPLIANCE INSPECTION REPORT (Coding Instructions on back of last page)													
TRANSACTION CODE		NPDES		YR MO DA		TYPE		INSPECTION		FAC TYPE		TIME	
1	2	3	11	12	17	18	19	20	a.m.	p.m.			
0	5	TX	0004201	85	01	29	5	U	2		0830		
REMARKS													
64													
21													
65													
70													
ADDITIONAL													
Photos Attached. Lab Report Attached.													
SECTION A - Permit Summary													
NAME AND ADDRESS OF FACILITY (Include County, State and ZIP code)										EXPIRATION DATE			
American Petrofina Co. of Texas										12 Sep 88			
32nd St & Highway 366, P.O. Box 849										ISSUANCE DATE			
Pt. Arthur, TX Jefferson City 77640										12 Sep 83			
RESPONSIBLE OFFICIAL						TITLE				PHONE			
Ken M. Suiter						Refinery Manager				409-962-4421			
FACILITY REPRESENTATIVE						TITLE				PHONE			
Jim Mahon/Burt St. Cyr						Env. Coord./Env. Spec.				Same			
SECTION B - Effluent Characteristics (Additional sheets attached _____) Loading Calculations by: J.D. Sullivan													
PARAMETER/OUTFALL				MINIMUM		AVERAGE		MAXIMUM		Checked by: Dennis Moyer			
CO1+CO5		SAMPLE MEASUREMENT						23ms/l		Data for CO only, no flow			
TOC		PERMIT REQUIREMENT						55mg/l		Grab 1/day when flowing			
Oil +		SAMPLE MEASUREMENT						4.1mg/l		Data for CO only			
Grease		PERMIT REQUIREMENT						15mg/l		ditto			
pH		SAMPLE MEASUREMENT				7.4				CO only, when flowing			
		PERMIT REQUIREMENT		6.0				9.0		Standard Units, 1/day, Grab			
CO2		SAMPLE MEASUREMENT						8mg/l					
TOC		PERMIT REQUIREMENT				55mg/l		75mg/l		2/week Grab			
Oil +		SAMPLE MEASUREMENT						4.6mg/l		FILMED			
Grease		PERMIT REQUIREMENT				10mg/l		15mg/l		2/week Grab			
SECTION C - Facility Evaluation (S = Satisfactory, U = Unsatisfactory, N/A = Not applicable)													
S EFFLUENT WITHIN PERMIT REQUIREMENTS				U OPERATION AND MAINTENANCE				U SAMPLING PROCEDURES					
S RECORDS AND REPORTS				U COMPLIANCE SCHEDULE				U LABORATORY PRACTICES					
U PERMIT VERIFICATION				S FLOW MEASUREMENTS				U OTHER: Condition of Receiving Streams					
SECTION D - Comments All deficiencies were discussed with permittee. / Streams.													
SECTION E - Inspection/Review													
SIGNATURES				AGENCY				DATE				ENFORCEMENT DIVISION USE ONLY	
INSPECTED BY J. David Sullivan w/ Dennis Moyer				6ES-HF				7 Feb 85				COMPLIANCE STATUS	
INSPECTED BY Linda Smith / by J.D.				TDWR, Dist. 6				Modified 28 Mar 85				<input type="checkbox"/> COMPLIANCE	
REVIEWED BY												<input type="checkbox"/> NONCOMPLIANCE	

4/2/85 DSW

NPDES COMPLIANCE INSPECTION REPORT (Coding Instructions on _____ of last page)

TRANSACTION CODE	NPDES	YR	MO	DA	TYPE	INSPEC- TOR	FAC TYPE	TIME
<input checked="" type="checkbox"/> 1	<input type="checkbox"/> 2	<input type="checkbox"/> 3	<input type="checkbox"/> 4	<input type="checkbox"/> 5	<input type="checkbox"/> 6	<input type="checkbox"/> 7	<input type="checkbox"/> 8	<input type="checkbox"/> 9
1	2	3	4	5	6	7	8	9
10	11	12	13	14	15	16	17	18
19	20	21	22	23	24	25	26	27
28	29	30	31	32	33	34	35	36
37	38	39	40	41	42	43	44	45
46	47	48	49	50	51	52	53	54
55	56	57	58	59	60	61	62	63
64	65	66	67	68	69	70	71	72
73	74	75	76	77	78	79	80	81
82	83	84	85	86	87	88	89	90
91	92	93	94	95	96	97	98	99
100	101	102	103	104	105	106	107	108
109	110	111	112	113	114	115	116	117
118	119	120	121	122	123	124	125	126
127	128	129	130	131	132	133	134	135
136	137	138	139	140	141	142	143	144
145	146	147	148	149	150	151	152	153
154	155	156	157	158	159	160	161	162
163	164	165	166	167	168	169	170	171
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208	209	210	211	212	213	214	215	216
217	218	219	220	221	222	223	224	225
226	227	228	229	230	231	232	233	234
235	236	237	238	239	240	241	242	243
244	245	246	247	248	249	250	251	252
253	254	255	256	257	258	259	260	261
262	263	264	265	266	267	268	269	270
271	272	273	274	275	276	277	278	279
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469	470	471	472	473	474	475	476	477
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487	488	489	490	491	492	493	494	495
496	497	498	499	500	501	502	503	504
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523	524	525	526	527	528	529	530	531
532	533	534	535	536	537	538	539	540
541	542	543	544	545	546	547	548	549
550	551	552	553	554	555	556	557	558
559	560	561	562	563	564	565	566	567
568	569	570	571	572	573	574	575	576
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586	587	588	589	590	591	592	593	594
595	596	597	598	599	600	601	602	603
604	605	606	607	608	609	610	611	612
613	614	615	616	617	618	619	620	621
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631	632	633	634	635	636	637	638	639
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649	650	651	652	653	654	655	656	657
658	659	660	661	662	663	664	665	666
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685	686	687	688	689	690	691	692	693
694	695	696	697	698	699	700	701	702
703	704	705	706	707	708	709	710	711
712	713	714	715	716	717	718	719	720
721	722	723	724	725	726	727	728	729
730	731	732	733	734	735	736	737	738
739	740	741	742	743	744	745	746	747
748	749	750	751	752	753	754	755	756
757	758	759	760	761	762	763	764	765
766	767	768	769	770	771	772	773	774
775	776	777	778	779	780	781	782	783
784	785	786	787	788	789	790	791	792
793	794	795	796	797	798	799	800	801
802	803	804	805	806	807	808	809	810
811	812	813	814	815	816	817	818	819
820	821	822	823	824	825	826	827	828
829	830	831	832	833	834	835	836	837
838	839	840	841	842	843	844	845	846
847	848	849	850	851	852	853	854	855
856	857	858	859	860	861	862	863	864
865	866	867	868	869	870	871	872	873
874	875	876	877	878	879	880	881	882
883	884	885	886	887	888	889	890	891
892	893	894	895	896	897	898	899	900
901	902	903	904	905	906	907	908	909
910	911	912	913	914	915	916	917	918
919	920	921	922	923	924	925	926	927
928	929	930	931	932	933	934	935	936
937	938	939	940	941	942	943	944	945
946	947	948	949	950	951	952	953	954
955	956	957	958	959	960	961	962	963
964	965	966	967	968	969	970	971	972
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982	983	984	985	986	987	988	989	990
991	992	993	994	995	996	997	998	999
1000	1001	1002	1003	1004	1005	1006	1007	1008
1009	1010	1011	1012	1013	1014	1015	1016	1017
1018	1019	1020	1021	1022	1023	1024	1025	1026
1027	1028	1029	1030	1031	1032	1033	1034	1035
1036	1037	1038	1039	1040	1041	1042	1043	1044
1045	1046	1047	1048	1049	1050	1051	1052	1053
1054	1055	1056	1057	1058	1059	1060	1061	1062
1063	1064	1065	1066	1067	1068	1069	1070	1071
1072	1073	1074	1075	1076	1077	1078	1079	1080
1081	1082	1083	1084	1085	1086	1087	1088	1089
1090	1091	1092	1093	1094	1095	1096	1097	1098
1099	1100	1101	1102	1103	1104	1105	1106	1107
1108	1109	1110	1111	1112	1113	1114	1115	1116
1117	1118	1119	1120	1121	1122	1123	1124	1125
1126	1127	1128	1129	1130	1131	1132	1133	1134
1135	1136	1137	1138	1139	1140	1141	1142	1143
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1180	1181	1182	1183	1184	1185	1186	1187	1188
1189	1190	1191	1192	1193	1194	1195	1196	1197
1198	1199	1200	1201	1202	1203	1204	1205	1206
1207	1208	1209	1210	1211	1212	1213	1214	1215
1216	1217	1218	1219	1220	1221	1222	1223	1224
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1288	1289	1290	1291	1292	1293	1294	1295	1296
1297	1298	1299	1300	1301	1302	1303	1304	1305
1306	1307	1308	1309	1310	1311	1312	1313	1314
1315	1316	1317	1318	1319	1320	1321	1322	1323
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1333	1334	1335	1336	1337	1338	1339	1340	1341
1342	1343	1344	1345	1346	1347	1348	1349	1350
1351	1352	1353	1354	1355	1356	1357	1358	1359
1360	1361	1362	1363	1364	1365	1366	1367	1368
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1378	1379	1380	1381	1382	1383	1384	1385	1386
1387	1388	1389	1390	1391	1392	1393	1394	1395
1396								

NPDES COMPLIANCE INSPECTION REPORT (Coding Instructions on back of last page)

TRANSACTION CODE <u>W</u>	NPDES <u>TX0004291</u>	YR <u>85</u>	MO <u>01</u>	DA <u>19</u>	TYPE <u>1</u>	INSPECTION <u>1</u>	FAC TYPE <u>2</u>	TIME <u>0830</u> <u>TL</u>
1	2	3	11	12	17	18	19	20

REMARKS

21
65
70
ADDITIONAL

SECTION A - Permit Summary

NAME AND ADDRESS OF FACILITY (Include County, State and ZIP code) <u>American Petrofina Co. of Texas</u> <u>32nd St. + Highway 366, P.O. Box 849</u> <u>Pt. Arthur, Jefferson Co., TX 77640</u>		EXPIRATION DATE <u>12 Sep 88</u>
RESPONSIBLE OFFICIAL <u>Ken M. Sciter</u>		TITLE <u>Refinery Manager</u>
FACILITY REPRESENTATIVE <u>Jim Mahon/Burt St. Cyr</u>		PHONE <u>409-962-4421</u>
		PHONE <u>Same</u>

SECTION B - Effluent Characteristics (Additional sheets attached _____)

PARAMETER/ OUTFALL		MINIMUM	AVERAGE	MAXIMUM	ADDITIONAL
<u>0014005</u>	SAMPLE MEASUREMENT				
<u>TOC</u>	PERMIT REQUIREMENT			<u>55 mg/l</u>	<u>Grab 1/day When flowing</u>
<u>Oil +</u>	SAMPLE MEASUREMENT				
<u>Grease</u>	PERMIT REQUIREMENT			<u>15 mg/l</u>	<u>ditto</u>
<u>pH</u>	SAMPLE MEASUREMENT				
	PERMIT REQUIREMENT	<u>6.0</u>		<u>9.0</u>	<u>Standard When flowing</u> <u>units (su.) Grab 1/day</u>
<u>002</u>	SAMPLE MEASUREMENT				
<u>TOC</u>	PERMIT REQUIREMENT		<u>55 mg/l</u>	<u>75 mg/l</u>	<u>2/week Grab</u>
<u>Oil +</u>	SAMPLE MEASUREMENT				
<u>Grease</u>	PERMIT REQUIREMENT		<u>10 mg/l</u>	<u>15 mg/l</u>	<u>2/week Grab</u>

SECTION C - Facility Evaluation (S = Satisfactory, U = Unsatisfactory, N/A = Not applicable)

<u>U</u> EFFLUENT WITHIN PERMIT REQUIREMENTS	<u>U</u> OPERATION AND MAINTENANCE	<u>U</u> SAMPLING PROCEDURES
<u>S</u> RECORDS AND REPORTS	<u>U</u> COMPLIANCE SCHEDULE	<u>U</u> LABORATORY PRACTICES
<u>U</u> PERMIT VERIFICATION	<u>S</u> FLOW MEASUREMENTS	<u>U</u> OTHER: <u>Condition of Receiving Stream</u>

SECTION D - Comments All deficiencies were discussed with permittee

SECTION E - Inspection/Review

SIGNATURES	AGENCY	DATE	ENFORCEMENT DIVISION USE ONLY
INSPECTED BY <u>J. David Sullivan / Denise Moyer</u>	<u>GES-HF</u>	<u>7 Feb 85</u>	
INSPECTED BY <u>Linda Smith / B. J. Smith</u>	<u>TDWR, Dist. 6</u>		
REVIEWED BY			

2/27/85 2810

28 Mar 85

TX0004201

1A of 4

SECTION B - Effluent Characteristics (Additional sheets attached _____) (Continued)

PARAMETER/ OUTFALL		MINIMUM	AVERAGE Kg/day (lbs/day)	MAXIMUM	ADDITIONAL
002	SAMPLE MEASUREMENT		6.6		APR 5 1985
PH	PERMIT REQUIREMENT	6.0		9.0	SU 1/day Grab
003	SAMPLE MEASUREMENT		1517	1590	gpm, for day of Samples
Flow	PERMIT REQUIREMENT		Report	Report	Continuous Recording
BOD ₅	SAMPLE MEASUREMENT		36.4 lb/d		
	PERMIT REQUIREMENT		368(810)	663(1460)	3/week Composite
TOC	SAMPLE MEASUREMENT		302.1 lb/d		
	PERMIT REQUIREMENT		1031(2270)	2061(4540)	ditto
TSS	SAMPLE MEASUREMENT		291.3 lb/d		
	PERMIT REQUIREMENT		440(970)	735(1620)	ditto
Oil & Grease	SAMPLE MEASUREMENT		76.5 lb/d		
	PERMIT REQUIREMENT		148(325)	222(490)	Grab 3/week
NH ₃ -N	SAMPLE MEASUREMENT		Sample not analyzed.		
	PERMIT REQUIREMENT		89(195)	177(390)	3/week Composite
Phenols	SAMPLE MEASUREMENT		0.55 lb/d		
	PERMIT REQUIREMENT		3.2(7.0)	6.4(14.0)	Grab 3/week
Sulfides	SAMPLE MEASUREMENT		< 1.8 lb/d		
	PERMIT REQUIREMENT		2.2(4.9)	4.4(9.8)	ditto
Total Cr	SAMPLE MEASUREMENT		1.5 lb/d		
	PERMIT REQUIREMENT		5.0(11.0)	10(22)	3/week Composite
Hex Cr	SAMPLE MEASUREMENT		0.18 lb/d		
	PERMIT REQUIREMENT		0.36(0.8)	0.73(1.6)	ditto
PH	SAMPLE MEASUREMENT		6.8		
	PERMIT REQUIREMENT	6.0		9.0	SU 1/day Grab
004	SAMPLE MEASUREMENT			No Flow	
TOC	PERMIT REQUIREMENT			75mg/l	1/day Grab, when flowing
Oil & Grease	SAMPLE MEASUREMENT			No Flow	
	PERMIT REQUIREMENT			15mg/l	ditto

R6-73 (3-78)

FILMED

NOTICE OF DEFICIENCY

U. S. Environmental Protection Agency Region VI

1. Issued to (Company City):

American Petrofina

2. Facility:

3. NPDES Permit No.:

TX0004201

DURING THE COMPLIANCE INSPECTION CARRIED OUT ON 29/30 Jan 85

4. Date, mo., day, yr.

DEFICIENCIES AS NOTED BELOW WERE FOUND. ADDITIONAL AREAS OF DEFICIENCY MAY BE BROUGHT TO YOUR ATTENTION FOLLOWING A COMPLETE REVIEW OF THE INSPECTION REPORT AND OTHER INFORMATION ON FILE WITH THE ENVIRONMENTAL PROTECTION AGENCY.

D ☒

5. Sample Preservation (Describe):

Hexavalent Chromium samples are being preserved with HNO_3 . No Preservative other than cooling should be used.

E

F ☐

6. Sample Collection Holding Time (Describe):

I

C ☐

7. Test Procedures; Section 304(g); 40 CFR 136 (Describe):

I

E ☐

8. Flow Monitoring (Describe):

N

C ☐

9. Monitoring / Laboratory Equipment Calibration (Describe):

I

E ☐

10. Record Keeping (Describe):

S

QUESTIONS CONCERNING THIS NOTICE SHOULD BE ADDRESSED TO:

11. Inspector's Name:

J. David Sullivan

13. Address:

6608 Hornwood

14. Telephone:

713-954-6766

12. Inspector's Signature:

J. David Sullivan

Houston, TX 77074

YOUR IMMEDIATE ATTENTION TO THE CORRECTION OF THE DEFICIENCIES NOTED ABOVE IS ADVISED. RECEIPT OF THE SIGNED STATEMENT OF CORRECTION BELOW WITHIN 15 DAYS WILL BE CONSIDERED IN THE DETERMINATION OF THE NEED FOR FURTHER ADMINISTRATIVE OR LEGAL ACTION. THE SIGNED STATEMENT BELOW SHOULD BE FORWARDED TO: SURVEILLANCE AND ANALYSIS DIVISION, U.S. ENVIRONMENTAL PROTECTION AGENCY, 1201 ELM STREET, FIRST INTERNATIONAL BUILDING, DALLAS, TEXAS 75270.

STATEMENT OF CORRECTION:

THE DEFICIENCIES NOTED HAVE BEEN CORRECTED TO FULLY COMPLY WITH THE NPDES PERMIT.

FILMED

15. Responsible Official's Signature:

K. M. Suiter

16. Date Signed:

2-8-85

17. Responsible Official's Name:

K. M. Suiter

18. Title:

Plant Manager

DISTRIBUTION: Orig. +1 to Permittee; 2 to Inspector; 3 filed with report.
R6-65 (August 77)

28 Mar 85

TX0004201
P. 1B of 4

SECTION 3 - Effluent Characteristics (Additional sheets attached _____) (Continued)

PARAMETER/ OUTFALL		MINIMUM	AVERAGE	MAXIMUM	ADDITIONAL
004	SAMPLE MEASUREMENT		No Flow		
PH	PERMIT REQUIREMENT	6.0		9.0	SU 1/day Grab When Flowing
	SAMPLE MEASUREMENT				
	PERMIT REQUIREMENT				
	SAMPLE MEASUREMENT				
	PERMIT REQUIREMENT				
	SAMPLE MEASUREMENT				
	PERMIT REQUIREMENT				
	SAMPLE MEASUREMENT				
	PERMIT REQUIREMENT				
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	PERMIT REQUIREMENT				
	SAMPLE MEASUREMENT				
	PERMIT REQUIREMENT				
	SAMPLE MEASUREMENT				
	PERMIT REQUIREMENT				

R6-73 (3-78)

FILMED

NPDES COMPLIANCE INSPECTION REPORT (Coding Instructions on back of last page)

TRANSACTION
CODE

M 5

NPDES

TX0000142011

YR MO DA
18 5 12TYPE
B 18INSPECTION
TOR J 19FAC
TYPE R 20

TIME

0830

a.m.

p.m.

REMARKS

64

ADDITIONAL

SECTION A - Permit Summary

NAME AND ADDRESS OF FACILITY (Include County, State and ZIP code)

American Petrofina Co. of Texas
32nd St. + Highway 366, P.O. Box 849
Port Arthur, Jefferson Cty, TX 77640

EXPIRATION DATE

12 Sep 88

ISSUANCE DATE

12 Sep 83

PHONE

409-962-4421

RESPONSIBLE OFFICIAL

Ken M. Suiter

TITLE

Refinery Manager

PHONE

Same

FACILITY REPRESENTATIVE

Jim Mahon / Bart St. Cyr

TITLE

Env. Coord. / Env. Spec.

SECTION B - Effluent Characteristics (Additional sheets attached)

ADDITIONAL

PARAMETER/ OUTFALL	MINIMUM	AVERAGE	MAXIMUM	ADDITIONAL
CO1 + CO5 TOC	SAMPLE MEASUREMENT			
	PERMIT REQUIREMENT			
Oil & Grease	SAMPLE MEASUREMENT			
	PERMIT REQUIREMENT			
CO3	SAMPLE MEASUREMENT			
	PERMIT REQUIREMENT			
Biomonitoring	SAMPLE MEASUREMENT			
	PERMIT REQUIREMENT			
	SAMPLE MEASUREMENT			
	PERMIT REQUIREMENT			

See Special Permit
Conditions

FILMED

SECTION C - Facility Evaluation (S = Satisfactory, U = Unsatisfactory, N/A = Not applicable)

EFFLUENT WITHIN PERMIT REQUIREMENTS	U	OPERATION AND MAINTENANCE	U	SAMPLING PROCEDURES	U
RECORDS AND REPORTS	U	COMPLIANCE SCHEDULE	U	LABORATORY PRACTICES	U
PERMIT VERIFICATION	S	FLOW MEASUREMENTS	U	OTHER: Condition	U

SECTION D - Comments

SECTION E - Inspection/Review

SIGNATURES	AGENCY	DATE
INSPECTED BY J. David Sullivan / Denise Meyer	GES-HF	7 Feb 85
INSPECTED BY Linda Smith / by J. David Sullivan	TDWR, Dist. 6	
REVIEWED BY		

ENFORCEMENT
DIVISION
USE ONLY

COMPLIANCE

COMPLIA

NONCOM

PA

SECTION B - Effluent Characteristics (Additional sheets attached _____) (Continued) TX0004201 p.1A of 4

PARAMETER/ OUTFALL		MINIMUM	AVERAGE Kg/day (155/day)	MAXIMUM	ADDITIONAL
002 PH	SAMPLE MEASUREMENT				
	PERMIT REQUIREMENT	6.0		9.0	SU 1/day Grab
003 Flow	SAMPLE MEASUREMENT				
	PERMIT REQUIREMENT		Report	Report	Continuous Recording
BOD ₅	SAMPLE MEASUREMENT				
	PERMIT REQUIREMENT		368(810)	663(1460)	3/week Composite
TOC	SAMPLE MEASUREMENT				
	PERMIT REQUIREMENT		1031(2270)	2061(4570)	ditto
TSS	SAMPLE MEASUREMENT				
	PERMIT REQUIREMENT		440(970)	735(1620)	ditto
Oil + Grease	SAMPLE MEASUREMENT				
	PERMIT REQUIREMENT		148(325)	222(490)	Grab 3/week
NH ₃ -N	SAMPLE MEASUREMENT				
	PERMIT REQUIREMENT		89(195)	177(390)	3/wk Composite
Phenols	SAMPLE MEASUREMENT				
	PERMIT REQUIREMENT		3.2(7.0)	6.4(14.0)	Grab 3/week
Sulfides	SAMPLE MEASUREMENT				
	PERMIT REQUIREMENT		2.2(4.9)	4.4(9.8)	Grab 3/week
Total Cr.	SAMPLE MEASUREMENT				
	PERMIT REQUIREMENT		5.0(11)	10(22)	FILMED 3/week Composite
Hex. Cr.	SAMPLE MEASUREMENT				
	PERMIT REQUIREMENT		0.36(0.8)	0.73(1.6)	3/wk Composite
PH	SAMPLE MEASUREMENT				
	PERMIT REQUIREMENT	6.0		9.0	S.U. 1/day Grab
004 TOC	SAMPLE MEASUREMENT				
	PERMIT REQUIREMENT			75mg/l	1/day Grab when flowing
Oil + Grease	SAMPLE MEASUREMENT				
	PERMIT REQUIREMENT			15 mg/l	ditto

SECTION B - Effluent Characteristics (Additional sheets attached _____) (Continued) TX0004201 1 Bot 4

PARAMETER/ OUTFALL		MINIMUM	AVERAGE	MAXIMUM	ADDITIONAL
004 PH	SAMPLE MEASUREMENT				S.U. 1 day Grab ^{when} flowing
	PERMIT REQUIREMENT	6.0		9.0	
	SAMPLE MEASUREMENT				
	PERMIT REQUIREMENT				
	SAMPLE MEASUREMENT				
	PERMIT REQUIREMENT				
	SAMPLE MEASUREMENT				
	PERMIT REQUIREMENT				
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	SAMPLE MEASUREMENT				
	PERMIT REQUIREMENT				
	SAMPLE MEASUREMENT				
	PERMIT REQUIREMENT				

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Sections F thru L: Complete on all inspections, as appropriate. N/A = Not Applicable

PERMIT NO.

TX0004201

SECTION F - Facility and Permit Background

ADDRESS OF PERMITTEE IF DIFFERENT FROM FACILITY
(Including City, County and ZIP code)

Same

DATE OF LAST PREVIOUS INVESTIGATION BY EPA/STATE
13+14 Dec 83 CEIFINDINGS Satisfactory Permit Verification,
Unsatisfactory for all other Categories

SECTION G - Records and Reports

RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT.

☒ YES ☐ NO ☐ N/A (Further explanation attached no)

DETAILS:

(a) ADEQUATE RECORDS MAINTAINED OF:

(i) SAMPLING DATE, TIME, EXACT LOCATION	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> N/A
(ii) ANALYSES DATES, TIMES	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> N/A
(iii) INDIVIDUAL PERFORMING ANALYSIS	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> N/A
(iv) ANALYTICAL METHODS/TECHNIQUES USED	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> N/A
(v) ANALYTICAL RESULTS (e.g., consistent with self-monitoring report data)	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> N/A

(b) MONITORING RECORDS (e.g., flow, pH, D.O., etc.) MAINTAINED FOR A MINIMUM OF THREE YEARS INCLUDING ALL ORIGINAL STRIP CHART RECORDINGS (e.g. continuous monitoring instrumentation, calibration and maintenance records).

☒ YES ☐ NO ☐ N/A

(c) LAB EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS KEPT.

☒ YES ☐ NO ☐ N/A

(d) FACILITY OPERATING RECORDS KEPT INCLUDING OPERATING LOGS FOR EACH TREATMENT UNIT.

☐ YES ☐ NO ☒ N/A

(e) QUALITY ASSURANCE RECORDS KEPT.

☒ YES ☐ NO ☐ N/A

(f) RECORDS MAINTAINED OF MAJOR CONTRIBUTING INDUSTRIES (and their compliance status) USING PUBLICLY OWNED TREATMENT WORKS.

☐ YES ☐ NO ☒ N/A

SECTION H - Permit Verification

INSPECTION OBSERVATIONS VERIFY THE PERMIT.

☐ YES ☒ NO ☐ N/A (Further explanation attached yes)

DETAILS:

Attach #1

(a) CORRECT NAME AND MAILING ADDRESS OF PERMITTEE.

☒ YES ☐ NO ☐ N/A

(b) FACILITY IS AS DESCRIBED IN PERMIT.

☒ YES ☐ NO ☐ N/A

(c) PRINCIPAL PRODUCT(S) AND PRODUCTION RATES CONFORM WITH THOSE SET FORTH IN PERMIT APPLICATION.

☒ YES ☐ NO ☐ N/A

(d) TREATMENT PROCESSES ARE AS DESCRIBED IN PERMIT APPLICATION.

☒ YES ☐ NO ☐ N/A

(e) NOTIFICATION GIVEN TO EPA/STATE OF NEW, DIFFERENT OR INCREASED DISCHARGES.

☐ YES ☐ NO ☒ N/A

(f) ACCURATE RECORDS OF RAW WATER VOLUME MAINTAINED.

☐ YES ☐ NO ☒ N/A

(g) NUMBER AND LOCATION OF DISCHARGE POINTS ARE AS DESCRIBED IN PERMIT.

☐ YES ☒ NO ☐ N/A

(h) CORRECT NAME AND LOCATION OF RECEIVING WATERS.

☒ YES ☐ NO ☐ N/A

(i) ALL DISCHARGES ARE PERMITTED.

☐ YES ☒ NO ☐ N/A

SECTION I - Operation and Maintenance

TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED.

☐ YES ☒ NO ☐ N/A (Further explanation attached yes)

DETAILS:

Attach # 1, 2

(a) STANDBY POWER OR OTHER EQUIVALENT PROVISIONS PROVIDED.

☒ YES ☐ NO ☐ N/A

(b) ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE.

☐ YES ☐ NO ☒ N/A

(c) REPORTS ON/ALTERNATE SOURCE OF POWER SENT TO EPA/STATE AS REQUIRED BY PERMIT.

☐ YES ☐ NO ☒ N/A

(d) SLUDGES AND SOLIDS ADEQUATELY DISPOSED.

☒ YES ☐ NO ☐ N/A

(e) ALL TREATMENT UNITS IN SERVICE.

☒ YES ☒ NO ☐ N/A

(f) CONSULTING ENGINEER RETAINED OR AVAILABLE FOR CONSULTATION ON OPERATION AND MAINTENANCE PROBLEMS.

☐ YES ☐ NO ☒ N/A

(g) QUALIFIED OPERATING STAFF PROVIDED.

☒ YES ☐ NO ☐ N/A

(h) ESTABLISHED PROCEDURES AVAILABLE FOR TRAINING NEW OPERATORS.

☐ YES ☒ NO ☐ N/A

(i) FILES MAINTAINED ON SPARE PARTS INVENTORY, MAJOR EQUIPMENT SPECIFICATIONS, AND PARTS AND EQUIPMENT SUPPLIERS.

☐ YES ☐ NO ☒ N/A

(j) INSTRUCTIONS FILES KEPT FOR OPERATION AND MAINTENANCE OF EACH ITEM OF MAJOR EQUIPMENT.

☐ YES ☐ NO ☒ N/A

(k) OPERATION AND MAINTENANCE MANUAL MAINTAINED.

☐ YES ☐ NO ☒ N/A

(l) SPCC PLAN AVAILABLE.

☒ YES ☐ NO ☐ N/A(m) REGULATORY AGENCY NOTIFIED OF BY PASSING. (Dates N/A)☐ YES ☐ NO ☒ N/A

(n) ANY BY-PASSING SINCE LAST INSPECTION.

☐ YES ☒ NO ☐ N/A

(o) ANY HYDRAULIC AND/OR ORGANIC OVERLOADS EXPERIENCED.

☒ YES ☐ NO ☐ N/A

PERMIT NO.
TX0004201

SECTION J - Compliance Schedules

PERMITTEE IS MEETING COMPLIANCE SCHEDULE.

☐ YES ☒ NO ☐ N/A (Further explanation attached no)

CHECK APPROPRIATE PHASE(S):

- ☒ (a) THE PERMITTEE HAS OBTAINED THE NECESSARY APPROVALS FROM THE APPROPRIATE AUTHORITIES TO BEGIN CONSTRUCTION.
- ☒ (b) PROPER ARRANGEMENT HAS BEEN MADE FOR FINANCING (mortgage commitments, grants, etc.).
- ☒ (c) CONTRACTS FOR ENGINEERING SERVICES HAVE BEEN EXECUTED.
- ☒ (d) DESIGN PLANS AND SPECIFICATIONS HAVE BEEN COMPLETED.
- ☒ (e) CONSTRUCTION HAS COMMENCED.
- ☒ (f) CONSTRUCTION AND/OR EQUIPMENT ACQUISITION IS ON SCHEDULE.
- ☒ (g) CONSTRUCTION HAS BEEN COMPLETED.
- ☐ (h) START-UP HAS COMMENCED.
- ☐ (i) THE PERMITTEE HAS REQUESTED AN EXTENSION OF TIME.

not met in that wastewater treatment system is not yet fully operational. Equalization basin not yet usable.
See Also Attached State Compliance Schedule.

SECTION K - Self-Monitoring Program

Part 1 - Flow measurement (Further explanation attached no)

PERMITTEE FLOW MEASUREMENT MEETS THE REQUIREMENTS AND INTENT OF THE PERMIT. ☒ YES ☐ NO ☐ N/A

- DETAILS:
- (a) PRIMARY MEASURING DEVICE PROPERLY INSTALLED. ☒ YES ☐ NO ☐ N/A
 - TYPE OF DEVICE: ☒ WEIR ☐ PARSHALL FLUME ☐ MAGMETER ☐ VENTURI METER ☐ OTHER (Specify _____)
 - (b) CALIBRATION FREQUENCY ADEQUATE. (Date of last calibration 30 Jan 84) ☒ YES ☐ NO ☐ N/A
 - (c) PRIMARY FLOW MEASURING DEVICE PROPERLY OPERATED AND MAINTAINED. ☒ YES ☐ NO ☐ N/A
 - (d) SECONDARY INSTRUMENTS (totalizers, recorders, etc.) PROPERLY OPERATED AND MAINTAINED. ☒ YES ☐ NO ☐ N/A
 - (e) FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGES OF FLOW RATES. ☒ YES ☐ NO ☐ N/A

Part 2 - Sampling (Further explanation attached yes, Attch #2, 1, 6)

- PERMITTEE SAMPLING MEETS THE REQUIREMENTS AND INTENT OF THE PERMIT. ☐ YES ☒ NO ☐ N/A
- DETAILS:
- (a) LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES. ☒ YES ☐ NO ☐ N/A
 - (b) PARAMETERS AND SAMPLING FREQUENCY AGREE WITH PERMIT. ☒ YES ☐ NO ☐ N/A
 - (c) PERMITTEE IS USING METHOD OF SAMPLE COLLECTION REQUIRED BY PERMIT. ☐ YES ☒ NO ☐ N/A
 - IF NO, ☐ GRAB ☐ MANUAL COMPOSITE ☐ AUTOMATIC COMPOSITE FREQUENCY
 - (d) SAMPLE COLLECTION PROCEDURES ARE ADEQUATE. ☒ YES ☐ NO ☐ N/A
 - (i) SAMPLES REFRIGERATED DURING COMPOSITING ☒ YES ☐ NO ☐ N/A
 - (ii) PROPER PRESERVATION TECHNIQUES USED ☒ YES ☐ NO ☐ N/A
 - (iii) FLOW PROPORTIONED SAMPLES OBTAINED WHERE REQUIRED BY PERMIT ☒ YES ☐ NO ☐ N/A
 - (iv) SAMPLE HOLDING TIMES PRIOR TO ANALYSES IN CONFORMANCE WITH 40 CFR 136.3 ☐ YES ☒ NO ☐ N/A
 - (e) MONITORING AND ANALYSES BEING PERFORMED MORE FREQUENTLY THAN REQUIRED BY PERMIT. ☐ YES ☐ NO ☒ N/A
 - (f) IF (e) IS YES, RESULTS ARE REPORTED IN PERMITTEE'S SELF-MONITORING REPORT. ☒ YES ☐ NO ☐

Part 3 - Laboratory (Further explanation attached no)

- PERMITTEE LABORATORY PROCEDURES MEET THE REQUIREMENTS AND INTENT OF THE PERMIT. ☒ YES ☐ NO ☐
- DETAILS:
- (a) EPA APPROVED ANALYTICAL TESTING PROCEDURES USED. (40 CFR 136.3) ☒ YES ☐ NO ☐
 - (b) IF ALTERNATE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED. ☐ YES ☐ NO ☒
 - (c) PARAMETERS OTHER THAN THOSE REQUIRED BY THE PERMIT ARE ANALYZED. ☒ YES ☐ NO ☐
 - (d) SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT. ☒ YES ☐ NO ☐
 - (e) QUALITY CONTROL PROCEDURES USED. ☒ YES ☐ NO ☐
 - (f) DUPLICATE SAMPLES ARE ANALYZED. 17-100% OF TIME. ☐ YES ☒ NO ☐
 - (g) SPIKED SAMPLES ARE USED. 17-100% OF TIME. ☐ YES ☐ NO ☐
 - (h) COMMERCIAL LABORATORY USED.
 - (i) COMMERCIAL LABORATORY STATE CERTIFIED.

LAB NAME

LAB ADDRESS

N/A

PERMIT NO.
TX0004201

SECTION L - Effluent/Receiving Water Observations (Further explanation attached yes Attch #3+4)

OUTFALL NO.	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	VISIBLE FLOAT SOL	COLOR	OTHER
001	Slight	Slight	High	None	Slight	Brown	
002	Slight	Moderate	High	None	Slight	Bright Green	
003	Slight None	Slight	High	High	High	Green	Oil Contamination Boomed off
Receiving 004 Stream	Heavy	Heavy	High	None	Slight	Green	
Receiving 005 Stream	Moderate	None	High	None	Slight	Green	
004+005	No Flow						

(Sections M and N: Complete as appropriate for sampling inspections)
 SECTION M - Sampling Inspection Procedures and Observations (Further explanation attached yes)
 - Oil & Grease, Sulfides, ~~TOC~~ TOC + PH + Biomonitors
 - at 003 only - BOD, TSS, NH₃-N, phenols, T.Cr., Hex Cr
 - Flow varied less than 10%
 - I SCO 2700
 - Not enough volume in sampler

☒ GRAB SAMPLES OBTAINED
☒ COMPOSITE OBTAINED
☒ FLOW PROPORTIONED SAMPLE
☒ AUTOMATIC SAMPLER USED
☐ SAMPLE SPLIT WITH PERMITTEE
☒ CHAIN OF CUSTODY EMPLOYED
☐ SAMPLE OBTAINED FROM FACILITY SAMPLING DEVICE
 COMPOSITING FREQUENCY 1 aliquot every 30 min. 350ml/hr. PRESERVATION wet ice, H₂SO₄, HNO₃, NaOH + Zn Acet. as approp
 SAMPLE REFRIGERATED DURING COMPOSITING: ☒ YES ☐ NO
 SAMPLE REPRESENTATIVE OF VOLUME AND NATURE OF DISCHARGE yes.

SECTION N - Analytical Results (Attach report if necessary) Field Analyses

001 - pH - 7.4
 002 - pH - 6.6
 003 - Flow - 1590 gpm
 pH - 6.8
 Temperature - 18°C

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PERMIT NO.

TX000 4201

SECTION L - Effluent/Receiving Water Observations (Further explanation attached NO)

OUTFALL NO.	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	VISIBLE FLOAT SOL	COLOR	OTHER
003	None Slight	Slight	High	High	High	Green Brown	

(Sections M and N: Complete as appropriate for sampling inspections)

SECTION M - Sampling Inspection Procedures and Observations (Further explanation attached yes) See Analytical Report
Attach #10

- ☒ GRAB SAMPLES OBTAINED Biomonitoring at 004
☐ COMPOSITE OBTAINED
☐ FLOW PROPORTIONED SAMPLE
☐ AUTOMATIC SAMPLER USED
☐ SAMPLE SPLIT WITH PERMITTEE Not requested
☒ CHAIN OF CUSTODY EMPLOYED
☐ SAMPLE OBTAINED FROM FACILITY SAMPLING DEVICE

COMPOSITING FREQUENCY _____

SAMPLE REFRIGERATED DURING COMPOSITING: ☐ YES ☐ NOSAMPLE REPRESENTATIVE OF VOLUME AND NATURE OF DISCHARGE YesPRESERVATION Wet Ice -**FILMED**

SECTION N - Analytical Results (Attach report if necessary)

* Fina's contract lab biomonitoring reports did not include a salinity analysis. These values have been provided by the contractor in attach. #
The contract lab reported verbally that instant ocean, a mixed natural salt concentrate, has routinely been added to the biomonitoring samples for use with M. bahia calmyra since the samples are at an average salinity of 4-6 ‰ and the shrimp are acclimated at 23 ‰ salinity. This may not follow approved methods.

NOTICE OF DEFICIENCY**U. S. Environmental Protection Agency
Region VI**

1. Issued to (Company City):

2. Facility:

3. NPDES Permit No.:

DURING THE COMPLIANCE INSPECTION CARRIED OUT ON

4. Date (mo.-day-yr.):

DEFICIENCIES AS NOTED BELOW WERE FOUND. ADDITIONAL AREAS OF DEFICIENCY MAY BE BROUGHT TO YOUR ATTENTION FOLLOWING A COMPLETE REVIEW OF THE INSPECTION REPORT AND OTHER INFORMATION ON FILE WITH THE ENVIRONMENTAL PROTECTION AGENCY.

D ☐

5. Sample Preservation (Describe):

E

F ☐

6. Sample Collection Holding Time (Describe):

I

C ☐

7. Test Procedures; Section 304(g); 40 CFR 136 (Describe):

I

E ☐

8. Flow Monitoring (Describe):

N

C ☐

9. Monitoring Laboratory Equipment Calibration (Describe):

I

E ☐

10. Record Keeping (Describe):

S

QUESTIONS CONCERNING THIS NOTICE SHOULD BE ADDRESSED TO:

11. Inspector's Name:

13. Address:

14. Telephone:

12. Inspector's Signature:

FILED

YOUR IMMEDIATE ATTENTION TO THE CORRECTION OF THE DEFICIENCIES NOTED ABOVE IS ADVISED. RECEIPT OF THE SIGNED STATEMENT OF CORRECTION BELOW WITHIN 30 DAYS WILL BE CONSIDERED IN THE DETERMINATION OF THE NEED FOR FURTHER ADMINISTRATIVE OR LEGAL ACTION. THE SIGNED STATEMENT BELOW SHOULD BE FORWARDED TO: SURVEILLANCE AND ANALYSIS DIVISION, U. S. ENVIRONMENTAL PROTECTION AGENCY, 1201 ELM STREET, FIRST INTERNATIONAL BUILDING, DALLAS, TEXAS 75270.

STATEMENT OF CORRECTION:

THE DEFICIENCIES NOTED HAVE BEEN CORRECTED TO FULLY COMPLY WITH THE NPDES PERMIT.

15. Responsible Official's Signature:

16. Date Signed:

17. Responsible Official's Name:

18. Title:

DISTRIBUTION: Orig. +1 to Permittee; 2 to Inspector; 3 filed with report.
R6-65 (August 77)

COMPLIANCE MONITORING ANALYTICAL REPORT

Atch #7 of 11

EPA -

Houston

Branch

P.1 of 2

Industry: American Petrofina Co. of TexasLocation: Pt. Arthur, TXPermit Number: TX0004201Discharge Number: 003Date Sampled: 29 & 30 Jan 85Time Sampled: 1030hrs - 1000hrsType of Sample: Grabs & CompositeWeather: Cold - DrizzleCalculated By: JAS

FIELD DATA

Time	Flow-GPM(MGD)	Temp-°C	pH	D.O.	Cl ₂
1/29 1000hrs	1590	18°C	6.8	N/A	N/A
1100	1590				
1200	1590				
1300	1457				
1400	1564				
1500	1484				
1600	1590				
1700	1431				
1800	1537				
1900	1510				
2000	1510				
2100	1458				
Range	See page 2				
Average					

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PERMIT LIMITS

	Flow-MGD	Temp-°C	pH	D.O.	Cl ₂
Daily Min.	See Page 2				
Daily Max.					
Daily Avg.					

COMPLIANCE MONITORING ANALYTICAL REPORT

Atch #7 of 11
p. 2 of 2

EPA - Houston

Branch

Industry: American Petrofina Co. of
Texas

Date Sampled: _____

Time Sampled: _____

Type of Sample: _____

Weather: _____

Calculated By: _____

Checked By: _____

Location: Pt. Arthur, TXPermit Number: TX0004201

Discharge Number: _____

FIELD DATA

Time	Flow-GPM(MGD)	Temp-°C	pH	D.O.	Cl ₂
2200	1404				
2300	1431				
2400	1405				
0100	1510				
0200	1537				
0300	1563				
0400	1537				
0500	1484				
0600	1537 1590				
0700	1590				
0800	1590				
0900	1458				
Range	1404 - 1590				
Average	1517				

FILMED

PERMIT LIMITS

	Flow-MGD	Temp-°C	pH	D.O.	Cl ₂
Daily Min.	1404	—	—		
Daily Max.	1590	18°C	6.8		
Daily Avg.	1517	—	—		

SAMPLE LOCATION:

American Petrofina Co. of Texas

Atch #8 of 11

Y OR INDUSTRY NAME AND LOCATION

T10004201

OBSERVATIONS & REMARKS FOR PERIOD BEGINNING

1000 hrs. ON 29 Jan, 1985

SHIFT
SUPERVISOR:SIGN YOUR
REMARKS!!!

OUTFALL NO.:

003

SAMPLE NO.:

WG-13-03-01 thru 14

29 Jan 85 The sampling team, Denise Moyer, ~~Linda~~ and I
 1000 hrs. Setup a new ISO 2700 with glass
 bottles on outfall 003. Center compartment
 was filled with ice. The sampler was setup
 to deliver ≈ 175 ml/s. every 30 minutes, 2 samples
 per each of 24 - 350 ml glass bottles. A
 grab sample for pH and temperature was
 taken. The temperature was 18°C . The pH
 meter would not calibrate probably due to
 an air temperature, and hence standards' temperature,
 of ≈ -2 to -3°C . The accuracy of this
 pH meter is doubtful at temperatures below
 12°C . The grab sample was taken to the
 Company's lab where the pH was determined,
 on a lab pH meter, to be 6.8. The pH
 on each of the other outfalls' grab samples
 were taken also. 001 - 7.4 002 - 6.6.

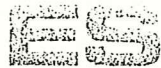
The 003 flowchart indicated 60 units. Factor is $26.5 = \text{gpm}$.

30 Jan 85 - The sampling team including Linda
 Smith of TDWR returned to collect the
 auto sampler. The sampler had functioned correctly,
 the ice was still sufficient in the bottom and
 the locks on the sample compartment were
 intact. All bottles were full. The sampler
 was removed to the company lab. It was
 determined by review of the flow chart that
 flow had not varied by more than $\pm 10\%$ so
 the entire sample was poured up for the composite.
 A. Biomonitoring grab sample was obtained as were
 oil & grease and sulphide samples.

J.D. Julli

TX4201

12



ENGINEERING-SCIENCE

RESEARCH AND DEVELOPMENT LABORATORY

924 GEMINI BOULEVARD • HOUSTON, TEXAS 77058 • 713/488-3004

RECEIVED

JAN 24 1985

6W-EA

January 2, 1985

Mr. Jim Mahon
Environmental Coordinator
American Petrofina Company of Texas
P. O. Box 849
Port Arthur, Texas 77640

Dear Jim:

I have enclosed a report summarizing the bio-screening test performed on the composited clarifier effluent sample collected on December 19 and 20, 1984.

If you have any questions, please do not hesitate to call.

Sincerely,

ENGINEERING-SCIENCE, INC.

A handwritten signature in cursive script, appearing to read 'Steve Beck'.

Steve Beck
Laboratory Manager

SB:dih
attachment

FILMED

STATIC BIO-SCREENING TEST: CLARIFIER DISCHARGE,
12/19/84 10:00 a.m. to 12/20/84 6:00 a.m.
TEST PERIOD: 12/20/84 to 12/21/84

SUMMARY

A 24-hour range finding screening test was conducted beginning December 20, 1984 on a composite clarifier effluent sample provided by American Petrofina, Port Arthur, Texas. The test was conducted at the Engineering-Science Houston Laboratory by Mr. Steve Beck. The bioassay was initiated on December 20, 1984 and ended December 21, 1984. The bioassay was performed in accordance with the "Range Finding Screening Test" given in Methods for Measuring the Acute Toxicity of Effluents to Aquatic Organisms, EPA 600/4-78-012.

The results of the bioassay are given below:

<u>SAMPLE I.D.</u>	<u>% LETHALITY IN 100%</u>
Clarifier Composite, 12/20/84	9.5
Control	0

TEST ORGANISMS/FEEDING

The organisms utilized for this test were 4-6 day old Mysid shrimp Mysidopsis almyra. They were obtained from Coastal and Marine Research Service, Galveston, Texas. During the test period the organisms were fed Brine shrimp Nauplii twice per day to prevent cannibalism.

TEST CONDITIONS

During the test period, a photo period of 14 hours light, 10 hours dark, and a water temperature of $22 \pm 2^{\circ}\text{C}$ were maintained. Air temperature was $23 \pm 2^{\circ}\text{C}$. Dissolved oxygen levels did not fall below the 65 percent level in any of the test containers.

DILUTION WATER/CONTAINERS

The test containers utilized were eight-inch glass, culture dishes obtained from Carolina Biological Supply, North Carolina.

Dilution water was prepared by dissolving synthetic sea salts in deionized water to a salinity of approximately 24 parts per thousand.

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TEST INITIATION

Twenty-four one-quart samples collected at one-hour intervals were composited to produce the test sample. Duplicate 100 percent (volume percent) test samples and controls were set up and at least ten organisms were added to each container.

Dissolved oxygen, temperature and pH were measured at the beginning and end of the test period. This data is presented in Table 2.

RESULTS

The tabulation of survivor data is presented in Table 1. Two mortalities were observed in the effluent sample.

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TABLE 1

<u>Sample I.D.</u>	<u>Volume %</u>	<u># Alive, 0 Hr.</u>	<u># Alive, 4 Hr.</u>	<u># Alive, 24 Hr.</u>	<u>Lethality %</u>
Control A	100	10	10	10	0
Control B	100	10	10	10	
Clarifier Eff. A	100	11	11	9	9.5
Clarifier Eff. B	100	10	10	10	

TABLE 2

<u>Sample I.D.</u>	<u>pH (S.U.)</u>		<u>D.O. (mg/)</u>		<u>Temp. (°C)</u>	
	<u>Begin</u>	<u>End</u>	<u>Begin</u>	<u>End</u>	<u>Begin</u>	<u>End</u>
Control	8.0	8.0	6.9	6.9	22	22
Clarifier Eff.	7.8	7.8	6.7	6.7	22	22



RECORD OF COMMUNICATION	<input checked="" type="checkbox"/> PHONE CALL <input type="checkbox"/> DISCUSSION <input type="checkbox"/> FIELD TRIP <input type="checkbox"/> CONFERENCE <input type="checkbox"/> OTHER (SPECIFY)	
	(Record of item checked above)	
TO: Barbara Burrell (6W-ET)	FROM: Mike Pitrie Fina (409) 962-4421	DATE 12/29/86 TIME 11:38 a.m.
SUBJECT Non compliance - Fina (TX 4201)		
SUMMARY OF COMMUNICATION <p>TSS was exceeded on December 18, 1986. TSS reported was over 18,000 lbs whereas the permit limit is 16,200 lbs. He is not sure what the cause is but would be discussing this with the personnel.</p> <p>Mike had called last week and had sent a report of non compliance on 12/22 to Ramesh.</p>		
CONCLUSIONS, ACTION TAKEN OR REQUIRED		
INFORMATION COPIES TO: Comp. File (TX4201)		

R6-123 (2-84)

MICROFILMED

Love
①

DEC 31 1986



RECEIVED

DEC 29 1986

6W-EA

Fina Oil and Chemical
Company
Post Office Box 849
Port Arthur, Texas 77640

December 23, 1986

Mr. M. S. Ramesh
U. S. Environmental Protection Agency
Region VI
1201 Elm Street
Dallas, Texas 75270

1 - Permit
2 - Compliance
3 - Compliance
4 - Mgt. Sum. Log
5 - PDR
6 - Correspondence
7 - CRAB
Date Filed
Clerk's Inits.

Dear Mr. Ramesh:

Re: NPDES Permit No. TX0004201 (TWC Permit No. 00491)
Fina Oil and Chemical Company
Port Arthur Refinery

Pursuant to Part II. Section D.6 of the above referenced permit, Fina Oil and Chemical Company hereby makes notification of the following noncompliant condition at Outfall 003.

<u>DATE</u>	<u>PARAMETER</u>	<u>ACTUAL DISCHARGE, LB/DAY</u>	<u>PERMITTED DISCHARGE, LB/DAY</u>
12/18/86	TSS	1884.1	1620

The cause of this noncompliance is not fully understood at the present time. More information will be provided to you as it becomes available.

Should you have questions regarding this matter, please contact me.

Sincerely,

Michael P. Pitre
Environmental Specialist

MPP:cf

cc: Mr. Harry Boudreaux

MICROFILMED

Lane
(11)

DEC 11 1986



RECEIVED

DEC 10 1986

6W-EA

Fina Oil and Chemical
Company
Post Office Box 849
Port Arthur, Texas 77640

December 8, 1986

Mr. M. S. Ramesh
U. S. Environmental Protection Agency
Region VI
InterFirst Two Building
1201 Elm Street
Dallas, Texas 75270

1 - Permit/CD
2 - AO & AO matl
3 - DMR's
4 - Vic. Sum. Log
5 - MCR
6 - Correspondence
7 - 2500
8 - Data Filed
9 - Clerk's Initials

1/8/87
LPR

Dear Mr. Ramesh:

Re: NPDES Permit No. TX0004201 (TWC Permit No. 00491)
Fina Oil and Chemical Company
Port Arthur Refinery

Pursuant to Part II, Section D.6 of the above referenced permit, Fina Oil and Chemical Company hereby makes notification of the following noncompliant condition at Outfall 003.

<u>DATE</u>	<u>PARAMETER</u>	<u>ACTUAL DISCHARGE, LB/DAY</u>	<u>PERMITTED DISCHARGE, LB/DAY</u>
12/1/86	Oil & Grease	1871.4	490

This noncompliance was caused by oily, biological sludge that was discharged from the final clarifier. The noncompliant condition existed for a short period of time before control of the clarifier was restored.

Should you have any questions regarding this matter, please contact me.

Sincerely,

Michael P. Pitre
Environmental Specialist

MPP:am

cc: Mr. Harry Boudreaux

MICROFILMED

Same ①



RECEIVED

NOV -5 1986

6W-EA

Fina Oil and Chemical
Company
Post Office Box 849
Port Arthur, Texas 77640

November 3, 1986

Mr. M. S. Ramesh
U. S. Environmental Protection Agency
Region VI
InterFirst Two Building
1201 Elm Street
Dallas, Texas 75270

1 - Permit/CD
2 - AO & AO matl
3 - DMR's
4 - Vio. Sum. Log
5 - NCR
6 - Correspondence
7 - CRAS
11-20-86 Date Filed
JPR Clerk's Inits.

Dear Mr. Ramesh:

Re: NPDES Permit No. TX0004201 (TWC Permit No. 000491)
Fina Oil and Chemical Company
Port Arthur Refinery

Pursuant to Part II, Section D.6 of the above referenced permit, Fina Oil and Chemical Company hereby makes notification of the following noncompliant condition at Outfall 003.

<u>DATE</u>	<u>PARAMETER</u>	<u>ACTUAL DISCHARGE, LB/DAY</u>	<u>PERMITTED DISCHARGE, LB/DAY</u>
10/29/86	Oil & Grease	537.2	490

This noncompliance was caused by two valves that were inadvertantly left partially open, allowing abnormal quantities of oil to reach the wastewater treatment facility via the process sewer.

Steps taken to prevent recurrence include the following:

1. The operators and supervisors involved have been counseled.
2. Operating procedures have been re-evaluated and as a result, a valve tagging procedure will be implemented.

Should you have any questions pertaining to this incident, please contact me.

Very truly yours,

Jane M. Pitre
M. P. Pitre

MPP:am

cc: Mr. H. Boudreaux

MICROFILMED

Lane
(1)

6 W-E



RECEIVED

OCT 28 1986

6W-EA

Fina Oil and Chemical
Company
Post Office Box 849
Port Arthur, Texas 77640

October 23, 1986

Ms. Barbara Burell
U. S. Environmental Protection Agency
Region VI
InterFirst Two Building
1201 Elm Street
Dallas, Texas 75270

- ____ 1 - Permit/CD
- ____ 2 - AO & AO matl
- ____ 3 - DMR's
- ____ 4 - Vio. Sum. Log
- ~~tdl~~ 5 - NCR
- ~~tdl~~ 6 - Correspondence
- ____ 7 - CRAS
- ____ Date Filed
- ____ Clerk's Inits.

Dear Ms. Burell:

Re: NPDES Permit No. TX0004201 (TWC Permit No. 000491)
Fina Oil and Chemical Company
Port Arthur Refinery

Pursuant to Part II, Section D.6 of the above referenced permit, Fina Oil and Chemical Company hereby makes notification of the following noncompliant condition at Outfall 004.

<u>DATE</u>	<u>PARAMETER</u>	<u>ACTUAL DISCHARGE, S.U.</u>	<u>PERMITTED DISCHARGE S.U.</u>
10-19-86	pH	10.8	6 - 9

The cause of this noncompliance is unknown.

Should you require further information regarding this matter, please contact me at (409) 962-4421.

Sincerely,

Michael P. Pitre

Michael P. Pitre
Environmental Specialist

MPP:am
cc: Mr. L. Soward

RECEIVED

OCT 27 1986

EPA GW-S
REGION VI

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Love
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RECEIVED

OCT 14 1986

6W-EA

Fina Oil and Chemical
Company
Post Office Box 849
Port Arthur, Texas 77640

October 10, 1986

Mr. M. S. Ramesh
U. S. Environmental Protection Agency
Region VI
InterFirst Two Building
1201 Elm Street
Dallas, Texas 75270

____ 1 - Permit/CD
____ 2 - AO & AO matl
____ 3 - DMR's
____ 4 - Vio. Sum. Log
~~____ 5 - NCR~~
____ 6 - Correspondence
____ 7 - CRAS
____ Date Filed ✓
____ Clerk's Inits.

Dear Mr. Ramesh:

Re: NPDES Permit No. TX0004201 (TWC Permit No. 000491)
Fina Oil and Chemical Company
Port Arthur Refinery

Pursuant to Part II, Section D.6 of the above referenced permit, Fina Oil and Chemical Company hereby makes notification of the following non-compliant condition at Outfall 003.

<u>DATE</u>	<u>PARAMETER</u>	<u>ACTUAL DISCHARGE, LB/DAY</u>	<u>PERMITTED DISCHARGE, LB/DAY</u>
10/3/86	BOD	1,475.4	1,460

This non-compliance is thought to have been associated with elevated (although compliant) concentrations of ammonia in the effluent stream. Steps have been taken to reduce the ammonia concentrations and thereby reduce the associated BOD.

Should you require further information regarding this matter, please contact me at (409) 962-4421.

Sincerely,

Michael P. Pitre
Environmental Specialist

MPP:am
cc: Mr. Larry Soward

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Save
①

TX-4201



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OCT -6 1986

6W-EA

Fina Oil and Chemical
Company
Post Office Box 849
Port Arthur, Texas 77640

October 2, 1986

Ms. Barbara Burell
U. S. Environmental Protection Agency
Region VI
InterFirst Two Building
1201 Elm Street
Dallas, Texas 75270

Dear Ms. Burell:

Re: NPDES Permit No. TX0004201 (TWC Permit No. 000491)
Fina Oil and Chemical Company
Port Arthur Refinery

Pursuant to Part II, Section D.6 of the above referenced permit, Fina Oil and Chemical Company hereby makes notification of the following non-compliant conditions at Outfall 003.

<u>DATE</u>	<u>PARAMETER</u>	<u>ACTUAL DISCHARGE, LB/DAY</u>	<u>PERMITTED DISCHARGE, LB/DAY</u>
9/24/86	BOD	2,644.3	1,460

These noncompliances are associated with, and are the result of, the incident I described to you in my letter of September 8, 1986. Should you have further questions concerning this matter, please contact me at (409) 962-4421.

Very truly yours,

for *Janet Macken*
Michael P. Pitre
Environmental Specialist

MPP:am
cc: Mr. Larry Soward

1 - Permit/CD
2 - AO & AO matl
3 - DMR's
4 - Vio. Sum. Log
5 - MCR
6 - Correspondence
7 - CRAS
Date Filed
Clerk's Inits.

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SEP 22 1986

6W-EA

Fina Oil and Chemical
Company
Post Office Box 849
Port Arthur, Texas 77640

September 18, 1986

Ms. Barbara Burell
U. S. Environmental Protection Agency
Region VI
InterFirst Two Building
1201 Elm Street
Dallas, Texas 75270

1 - Permit/CD
2 - A3 & A0 matl
3 - DNR's
4 - Via. Sum. Log
5 - NCR
6 - Correspondence
7 - CRAS
Date Filed
Clerk's Inits.

Dear Ms. Burell:

Re: NPDES Permit No. TX0004201 (TWC Permit No. 000491)
Fina Oil and Chemical Company
Port Arthur Refinery

Pursuant to Part II, Section D.6 of the above referenced permit, Fina Oil and Chemical Company hereby makes notification of the following non-compliant conditions at Outfall 003.

<u>DATE</u>	<u>PARAMETER</u>	<u>ACTUAL DISCHARGE, LB/DAY</u>	<u>PERMITTED DISCHARGE, LB/DAY</u>
9/10/86	BOD	3,753.2	1,460
9/11/86	BOD	3,226.4	1,460
9/12/86	BOD	2,872.3	1,460

These noncompliances are associated with, and are the result of, the incident I described to you in my letter of September 8, 1986. Should you have further questions concerning this matter, please contact me at (409) 962-4421.

Very truly yours,

Michael P. Pitre

Michael P. Pitre
Environmental Specialist

MPP:am

cc: Mr. Larry Soward

MICROFILMED

Love ①



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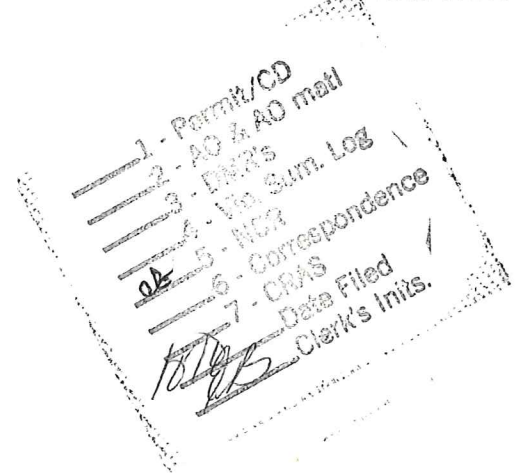
SEP 18 1986

6W-EA

Fina Oil and Chemical
Company
Post Office Box 849
Port Arthur, Texas 77640

September 15, 1986

Ms. Barbara Burell
U. S. Environmental Protection Agency
Region VI
InterFirst Two Building
1201 Elm Street
Dallas, Texas 75270



Dear Ms. Burell:

Re: NPDES Permit No. TX0004201 (TWC Permit No. 00491)
Fina Oil and Chemical Company
Port Arthur Refinery

Pursuant to Part II, Section D.6 of the above referenced permit, Fina Oil and Chemical Company hereby makes notification of the following noncompliant conditions at Outfall 003.

<u>DATE</u>	<u>PARAMETER</u>	ACTUAL	PERMITTED
		<u>DISCHARGE, LB/DAY</u>	<u>DISCHARGE, LB/DAY</u>
9/3/86	BOD ₅	1,726.2	1,460
9/4/86	BOD ₅	3,254.9	1,460
9/5/86	BOD ₅	4,534.9	1,460
9/9/86	NH ₃	492.2	390

These noncompliances are associated with, and the result of, the incident I described to you in my letter of September 8, 1986. Should you have further questions concerning this matter, please contact me at (409) 962-4421.

Very truly yours,

Michael P. Pitre

Michael P. Pitre
Environmental Specialist

MPP:am

cc: Mr. Larry Soward

MICROFILMED

RECORD OF COMMUNICATION

☒ PHONE CALL ☐ DISCUSSION ☐ FIELD TRIP ☐ CONFERENCE

☐ OTHER (SPECIFY)

(Record of item checked above)

TO: Barbara Burrell
(6W-ET)

FROM: Mike Petri
Fina Oil & Chemical
(409) 962-4421

DATE 9/12/86

TIME 11:50 am

SUBJECT

Noncompliance Notification

SUMMARY OF COMMUNICATION

On 9/6/86, Fina experienced an excursion at Outfall 002. The pH was 3.2 from the 9/6/86 sample.

Mike attributed the excursion to a leaking underground acid line. Since that time, the line had been excavated & repaired.

The only violations in the last 6 mos have occurred this month. If this is the case, their consent decree may ~~not~~ stand as is, not include these violations.

CONCLUSIONS, ACTION TAKEN OR REQUIRED

Letter to Follow

INFORMATION COPIES

TO: Comp. File (~~6W-ET~~ TX 4201)



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SEP 12 1986

6W-EA

Fina Oil and Chemical
Company
Post Office Box 849
Port Arthur, Texas 77640

September 10, 1986

Ms. Barbara Burell
U. S. Environmental Protection Agency
Region VI
InterFirst Two Building
1201 Elm Street
Dallas, Texas 75270

1 - Permit/CD
2 - AO & AO matl
3 - DMR's
4 - Vio. Sum. Log
5 - NCR
6 - Correspondence
7 - CRAS
Date Filed
Clark's Inits.

Dear Ms. Burell:

Re: NPDES PERMIT NO. TX0004201 (TWC PERMIT NO. 00491)
FINA OIL AND CHEMICAL COMPANY
PORT ARTHUR REFINERY

Pursuant to Part II, Section D.6 of the above referenced permit, Fina Oil and Chemical Company hereby makes notification of a noncompliant condition at Outfall 002 on September 6, 1986. On this date, the pH of the water discharged was measured to be 3.2.

The cause of this noncompliance was determined to be a leak in an underground acid line. This line has been taken out of service until repairs can be made.

Should you have further questions concerning this matter, please contact me at (409) 962-4421.

Very truly yours,

Michael P. Pitre
Environmental Specialist

MPP:am

cc: Mr. Larry Soward

MICROFILMED



RECEIVED

SEP 12 1986

6W-EA

Fina Oil and Chemical
Company
Post Office Box 849
Port Arthur, Texas 77640

September 10, 1986

Ms. Barbara Burell
U. S. Environmental Protection Agency
Region VI
InterFirst Two Building
1201 Elm Street
Dallas, Texas 75270

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2 - AO & AO matl
3 - DMR's
4 - Via. Sum. Log
5 - NCR
6 - Correspondence
7 - CRAS
Date Filed
Clerk's Inits.

Dear Ms. Burell:

Re: NPDES PERMIT NO. TX0004201 (TWC PERMIT NO. 00491)
FINA OIL AND CHEMICAL COMPANY
PORT ARTHUR REFINERY

Pursuant to Part II, Section D.6 of the above referenced permit, Fina Oil and Chemical Company hereby makes notification of the following noncompliant conditions occurring on September 4 and 5, 1986 at Outfall 003.

<u>DATE</u>	<u>PARAMETER</u>	<u>ACTUAL DISCHARGE, LB/DAY</u>	<u>PERMITTED DISCHARGE, LB/DAY</u>
9/5/86	Oil & Grease	699.3	490
9/4/86	TSS	1,754.7	1,620
9/4/86	Ammonia	547.8	390

As we discussed during our telephone conversation of September 8, 1986, these noncompliances are associated with and are the results of the incident I described in my letter to you of that date. Should you have further questions concerning this matter, please contact me at (409) 962-4421.

Very truly yours,

Michael P. Pitre
Environmental Specialist

MPP:am
cc: Mr. Larry Soward

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RECEIVED

SEP 10 1986

6W-EA

Fina Oil and Chemical
Company
Post Office Box 849
Port Arthur, Texas 77640

September 8, 1986

Ms. Barbara Burell
U. S. Environmental Protection Agency
Region VI
InterFirst Two Building
1201 Elm Street
Dallas, Texas 75270

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2 - AO & AO matl
3 - DMR's
4 - Vio. Sum. Log
~~100~~ 5 - NCR
6 - Correspondence
7 - CRAS
Date Filed ✓
Clark's Inits.

Dear Ms. Burell:

Re: NPDES Permit No. TX0004201 (TWC Permit No. 00491)
Fina Oil and Chemical Company
Port Arthur Refinery

Pursuant to Part II, Section D.6 of the above referenced permit, Fina Oil and Chemical Company hereby makes notification of a noncompliant condition on September 2, 1986. On this date, the quantity of ammonia discharged from Outfall 003 was 461.6 pounds (exceeding the daily maximum limitations of 390 pounds). Causes of this noncompliant condition are described below.

As in most undesirable operating situations, seemingly insignificant equipment malfunctions tend to have a "snowball" effect, ultimately resulting in major operational problems. In this particular case, several water seals in the refinery malfunctioned. This seemingly insignificant occurrence allowed slugs of hydrocarbons to be fed to a process water stripper. (The function of this stripper is to remove sulfur compounds and ammonia from the process water which is subsequently routed to the process sewer). This hydrocarbon material caused a severe upset of the stripper which in turn reduced stripping efficiency and allowed the ammonia concentrations to increase in the water routed to the process sewer. The wastewater treatment system then received a shock load of ammonia as well as elevated quantities of oil associated with unit upsets and shutdowns.

Steps taken immediately to determine and eliminate the hydrocarbon source as well as minimize the impact on NPDES compliance included: reducing feedrates to the process water stripper, repairing suspect water seals, supplementing the

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Page 2 of 2
September 5, 1968
M. P. Pitre
Port Arthur

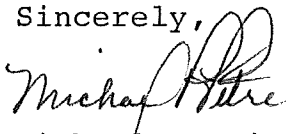
biological treatment system with freeze-dried bacteria and reducing wastewater throughput to minimize the quantity of ammonia discharged. Although these immediate actions were taken, the duration of the noncompliant condition depends upon the recuperative power of the biological system; and this is uncertain.

Several measures have been identified which would help prevent recurrence of the problems described above. These are:

1. Study available instrumentation to determine if improvements can be made in the detection and isolation of hydrocarbons in water seals.
2. Improve communications between inside and outside supervisors.
3. Begin ammonia analysis on the tails stream of the process water stripper.
4. Institute a task team to determine the source of oil in refinery wastewater.

Should you have any questions concerning this matter, please contact me at (409) 962-4421.

Sincerely,



Michael P. Pitre
Environmental Specialist

MPP:am

cc: Mr. Larry Soward

MICROFILMED

RECORD OF COMMUNICATION		<input checked="" type="checkbox"/> PHONE CALL <input type="checkbox"/> DISCUSSION <input type="checkbox"/> FIELD TRIP <input type="checkbox"/> CONFERENCE <input type="checkbox"/> OTHER (SPECIFY)	
		(Record of item checked above)	
TO: Barbara Burrell (6W-ET)	FROM: Mike Petric Fina Oil & Chem.	DATE 9/8/86	TIME 3:00pm
SUBJECT Non Compliance at Fina Oil & Chem (TX4201)			
SUMMARY OF COMMUNICATION <p>Fina experienced additional noncompliance since last week:</p> <div style="margin-left: 40px;"> 9/4/86 NH₃ (daily max) 547.8 lbs/day TSS (") 1754 lbs/day 9/5/86 O₂G (daily max) 699 lbs/day </div> <p>Noncompliances were attributed to refinery upsets. The upset occurred in the Process water stripper which released NH₃ to the biological system and caused a "Shock". The upset did not reoccur occur in the WWTP; therefore, they are not reporting this instance as an upset since it did not meet criteria.</p> <p>He did not expect the NH₃, O₂G and TSS excursions to be reoccur because the system is stabilizing. No violations had occurred in the last 8-9 months.</p>			
CONCLUSIONS, ACTION TAKEN OR REQUIRED			
INFORMATION COPIES TO: Comp. File (TX4201)			

RECORD OF COMMUNICATION	<input checked="" type="checkbox"/> PHONE CALL <input type="checkbox"/> DISCUSSION <input type="checkbox"/> FIELD TRIP <input type="checkbox"/> CONFERENCE <input type="checkbox"/> OTHER (SPECIFY)		
	(Record of item checked above)		
TO: Barbara Burrell (6W-ET)	FROM: Mike Pitre Env. Specialist (409) 962-4421	DATE 9/4/86	
		TIME 1:30pm	
SUBJECT Noncompliance at Fina Oil and Chem, Port Arthur (TX 4201)			
SUMMARY OF COMMUNICATION <p>He received the analysis yesterday for composite samples collected 9/2/86. The Ammonia had exceeded the permit limit at Outfall 003.</p> <p style="text-align: center;">NH₃ 461.6 lbs/day (390 lbs/day - permitted)</p> <p>They are studying the cause of the exceedance, and will report to EPA.</p>			
CONCLUSIONS, ACTION TAKEN OR REQUIRED <p>Letter To Follow</p>			
INFORMATION COPIES TO: Comp. File (TX 4201)			

R6-123 (2-84)

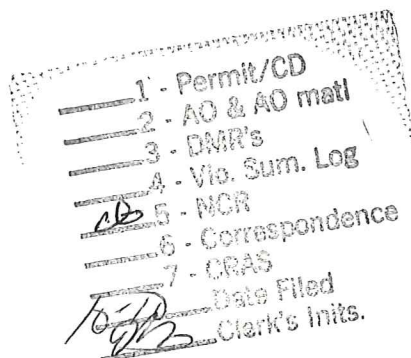
MICROFILMED

Lane ①



Finna Oil and Chemical
Company
Post Office Box 849
Port Arthur, Texas 77640

June 5, 1986



RECEIVED
JUN 10 1986
6W-EA

Mr. M. S. Ramesh
U. S. Environmental Protection Agency
Region VI, Water Management Division
1201 Elm Street, InterFirst Two Building
Dallas, Texas 75270

Dear Mr. Ramesh:

Re: NPDES Permit No. TX0004201 (TWC Permit No. 00491)
Fina Oil and Chemical Company
Port Arthur Refinery
Wastewater Treatment System Upset

Pursuant to our recent meeting pertaining to the upset condition experienced at Fina's Port Arthur Refinery on May 6, 13, and 20, 1986, the following explanation is intended to further substantiate our position on this issue and to provide the additional information you requested. As stated in our initial letter of May 19, 1986, the upset condition was caused by an unusually large quantity of clarified oil entering the refinery's wastewater treatment system as the result of the failure of a transfer line. This line failure occurred on May 3, 1986. Approximately 6,000 barrels of clarified oil spilled into the process sewer as a result of the line failure. The line failure occurred in a catch basin where the transfer line transverses the header to the wastewater treatment system. By the time the source of the oil was identified, the oil had carried through the CPI separators, Dissolved Air Flootation Unit, Equalization Basin, and accumulated in the Aeration Basin. Trace quantities were found in the final clarifier.

The first step taken to mitigate the effects this incident had on the treatment system was to increase the quantity of material being drawn off the bottom of the CPI separators. Additionally, waste rates and mixed liquor solids from the clarifier were increased in order to remove any residual oil which might have accumulated in the activated sludge.

Additionally, vacuum trucks were utilized to remove free oil

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Page 2
June 5, 1986
J. C. Mahon
Port Arthur

which accumulated on top of the Aeration Basin. Once the oil was introduced into the biological system, the bacteria became coated with oil, thereby effecting a reduction in oil removal efficiency. This consequently had a negative impact on the nitrification process. Although a total biological kill did not result, approximately two weeks were required for the system to recover. It should be emphasized that of all the effluent characteristics established by the permit, only ammonia and BOD were exceeded.

Clarified oil is the heavy oil fraction produced from the catalytic cracking of gas oil charged to the company's Fluid Catalytic Cracking Unit. This oil is subsequently subjected to additional processing prior to storage pending sale.

General properties of clarified oil are shown below. These properties are based on a temperature of 100°F.

<u>Pressure</u> <u>PSIG</u>	<u>Molecular</u> <u>Weight</u>	<u>Density</u> <u>Lb/Bbl</u>	<u>Specific</u> <u>Gravity</u>
100.0	490.9	245.21	1.0927

Fina remains confident that the circumstances surrounding this incident clearly qualify as an upset as defined under Part II, Section B-4. Additionally, the Company's response to this incident was adequate as evidenced by the relatively quick recovery of the wastewater system. Furthermore, in an effort to prevent recurrence, the Company plans to replace the transfer line in the near future.

Should you require any additional information pertaining to this matter, please let me know.

Very truly yours,

James Mahon

J. C. Mahon
Environmental Coordinator

JCM:am
cc: Mr. L. Soward

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JUN 10 1986
6W-EA

MICROFILMED



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JUN -2 1986

6W-EA

Fina Oil and Chemical
Company
Post Office Box 849
Port Arthur, Texas 77640

May 27, 1986

Mr. Myron O. Knudson
U. S. Environmental Protection Agency
Region VI, Water Management Division
1201 Elm Street, InterFirst Two Building
Dallas, Texas 75270

1 - Permit/CD
2 - AO & AO matl
3 - DMR's
4 - Vio. Sum. Log
5 - NCR
6 - Correspondence
7 - CRAS
Data Filed
Clerk's Inits.

Dear Mr. Knudson:

Re: NPDES Permit No. TX0004201 (TWC Permit No. 00491)

Pursuant to Part II, Sections B.4 and D.6 of the above referenced permit, Fina Oil and Chemical Company hereby makes written notification of the following daily maximum noncompliant event:

<u>DATE</u>	<u>PARAMETER</u>	<u>ACTUAL</u>	<u>PERMIT</u>
5/20/86	BOD ₅	1,663.4 lbs.	1,460 lbs.

This noncompliant condition was a result of the upset described in my correspondence of May 19, 1986. As stated in that letter, the effects of this upset are expected to be temporary.

Should you require further information regarding this matter, please feel free to contact me at (409) 962-4421.

Sincerely,

Michael P. Pitre
Environmental Specialist

MPP:am

cc: Mr. Larry Soward

MICROFILMED

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MAY 27 1986

6W-EA

Fina Oil and Chemical
Company
Post Office Box 849
Port Arthur, Texas 77640

May 21, 1986

____ 1 - Permit/CD
____ 2 - AO & AO matl
____ 3 - DMR's
____ 4 - Vio. Sum. Log
~~____ 5 - NCR~~
____ 6 - Correspondence
____ 7 - CRAS
____ Date Filed
____ Clerk's Inits.

Mr. Myron O. Knudson
U. S. Environmental Protection Agency
Region VI, Water Management Division
1201 Elm Street, InterFirst Two Building
Dallas, Texas 752770

Dear Mr. Knudson:

Re: NPDES Permit No. TX 0004201 (TWC Permit No. 00491)

Pursuant to Part II, Section B.4 and D.6 of the above referenced permit, Fina Oil and Chemical Company hereby makes written notification of the following daily maximum noncompliant event:

<u>DATE</u>	<u>PARAMETER</u>	<u>ACTUAL</u>	<u>PERMIT</u>
5/15/86	NH ₃ -N	421.0 lbs.	390 lbs.

This noncompliant condition was a result of the upset described in my correspondence of May 19, 1986. Once again, the effects from this upset are expected to be temporary.

Should you require further information regarding this matter, please feel free to contact me at (409) 962-4421.

Sincerely,

Michael P. Pitre
Environmental Specialist

MPP:am

cc: Mr. Larry Soward

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MAY 22 1986

6W-EA

Fina Oil and Chemical
Company
Post Office Box 849
Port Arthur, Texas 77640

May 19, 1986

Mr. Myron O. Knudson
U. S. Environmental Protection Agency
Region VI, Water Management Division
1201 Elm Street, InterFirst Two Building
Dallas, Texas 75270

____1 - Permit/CD
____2 - AO & AO matl
____3 - DMR's
____4 - Vio. Sum. Log
____5 - NCR
____6 - Correspondence
____7 - CRAS
____Date Filed
____Clerk's Inits.

Dear Mr. Knudson:

Re: NPDES Permit No. TX0004201 (TWC Permit No. 00491)

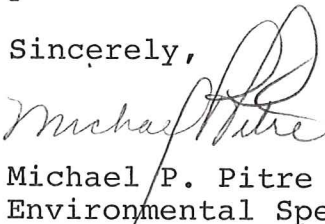
Pursuant to Part II, Sections B.4 and D.6 of the above referenced permit, Fina Oil and Chemical Company hereby makes written notification of an upset condition resulting in the following daily maximum permit excursions:

<u>DATE</u>	<u>PARAMETER</u>	<u>ACTUAL</u>	<u>PERMIT</u>
5/6/86	BOD	1,825.8 lbs	1,460 lbs
5/13/86	NH ₃ - N	407.1 lbs	390 lbs

The upset condition was caused by an unusually large quantity of clarified oil routed to the wastewater treatment facility as a result of a transfer pipeline failure on May 3, 1986. Every practical, physical means of removing the oil from the treatment system has been employed including extensive use of a contract vacuum truck service. Where possible, wastewater flows in the refinery have been reduced in an effort to minimize the environmental impact of this upset condition. Additionally, the section of pipeline which failed has been replaced to prevent recurrence. Furthermore, Fina's compliance record over the past six months provides evidence that the wastewater treatment plant has been operated in a proper manner. Although the term of this noncompliant condition, resulting from the upset, cannot be accurately predicted, the situation is expected to be temporary.

Should you require further information regarding this matter, please feel free to contact me at (409) 962-4421.

Sincerely,


Michael P. Pitre
Environmental Specialist

MPP:am

cc: Mr. Larry Soward

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NAME CHANGED TO:

FINA OIL and CHEMICAL COMPANY

AMERICAN PETROFINA COMPANY OF TEXAS

POST OFFICE BOX 849

PORT ARTHUR, TEXAS 77640

March 14, 1986

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MAR 18 1986

6W-EA

Mr. Larry Soward
Executive Director
Texas Department of Water Resources
Self-Reporting Section
P. O. Box 13087
Austin, Texas 78711

Dear Sir:

Re: Industrial Wastewater Permit No. 00491

Pursuant to Part II, A, 2 of the above-referenced permit, Fina Oil and Chemical Company, Port Arthur Refinery hereby advises you of the noncompliant condition detailed below.

Location of Noncompliance: Outfall 001

Time and Date Observed: Copy of lab analysis was received at approximately 10:00 A.M. on March 13, 1986.

Description of Noncompliance: Oil and grease concentration was 23.2 mg/l at Outfall 001.

Duration of Noncompliance: Duration of noncompliance was one day.

Steps Taken To Eliminate Noncompliant Discharge and to Prevent Recurrence: An internal investigation has been undertaken to determine the cause of the noncompliance and to identify the appropriate actions necessary to prevent recurrence.

Sincerely,

Michael P. Pitre
Environmental Specialist

MPP:am

cc: Mr. H. Boudreaux
Mr. T. Giesberg

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MAR 26 1986

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NAME CHANGED TO:
FINA OIL and CHEMICAL COMPANY

AMERICAN PETROFINA COMPANY OF TEXAS

POST OFFICE BOX 849

PORT ARTHUR, TEXAS 77640

March 25, 1986

Ms. Diana Buck, Chief
Administrative Support Unit (6W-EAS)
U. S. Environmental Protection Agency
Region VI
InterFirst Two Building
1201 Elm Street
Dallas, Texas 75270

Dear Ms. Buck:

The NPDES permit number that you requested is TX0004201.
Please excuse the omission.

Sincerely,

Michael P. Pitre
Environmental Specialist

MPP:am
Attachment

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MAR 26 1986

6W-EA

- 1 - Permit/CD
- 2 - AO & AO matl
- 3 - DMR's
- 4 - Vio. Sum. Log
- 5 - NCR
- 6 - Correspondence
- 7 - CRAS
- 8 - Date Filed
- 9 - Clerk's Inits.

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NAME CHANGED TO:
FINA OIL and CHEMICAL COMPANY

AMERICAN PETROFINA COMPANY OF TEXAS

POST OFFICE BOX 849

PORT ARTHUR, TEXAS 77640

March 4, 1986

Mr. M. S. Ramesh
U. S. Environmental Protection Agency
Region VI
InterFirst Two Building
1201 Elm Street
Dallas, Texas 75270

1 - Permit/CD
2 - AO & AO matl
3 - DM's
4 - Via. Sum. Log
5 - NCR
6 - Correspondence
7 - CRAS
Date Filed
Clerk's Inits.

Dear Mr. Ramesh:

Pursuant to Part II, Section B.4 of NPDES Permit No. TX0004201, Fina Oil and Chemical Company makes report of an upset condition resulting from a fire in the Distillate Hydrotreating Unit on February 13, 1986. Emergency efforts were undertaken immediately to minimize danger to operating personnel as well as minimizing damage to process equipment and the environment.

At the time of the incident, the operational status of the wastewater treatment system was excellent. Based on this operational data, the assumption was made that the treatment system could effectively handle the influent wastewater associated with the upset. However, laboratory analysis of the Outfall 003 composite sample for February 25, 1986 shows that the system was incapable of handling the quantity of ammonia received in the wastewater treatment plant influent during the upset. The quantity of ammonia discharged from Outfall 003 on that date was 667.1 pounds (measured as $\text{NH}_3\text{-N}$), an exceedance of the NPDES daily maximum discharge limitation.

Should you require more information regarding this upset and/or its resulting effects, please contact me at (409) 962-4421 so we might discuss the matter.

Sincerely,

Michael P. Pitre
Environmental Specialist

MPP:am

cc: Mr. H. Boudreaux

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NAME CHANGED TO:
FINA OIL and CHEMICAL COMPANY

AMERICAN PETROFINA COMPANY OF TEXAS

POST OFFICE BOX 849

PORT ARTHUR, TEXAS 77640

February 28, 1986

Mr. M. S. Ramesh
U. S. Environmental Protection Agency
Region VI
InterFirst Two Building
1201 Elm Street
Dallas, Texas 75270

1 - Permit/CD
2 - AO & AO matl
3 - DMH's
4 - Vic. Sum. Log
5 - NCR
6 - Correspondence
7 - CRAS
3-11-86 Date Filed
JPP Clerk's Inits.

Dear Mr. Ramesh:

Pursuant to Part II, Section B.4 of NPDES Permit No. TX0004201, Fina Oil and Chemical Company makes report of an upset condition resulting from a fire in the Distillate Hydrotreating Unit on February 13, 1986. Emergency efforts were undertaken immediately to minimize danger to operating personnel as well as minimizing damage to process equipment and the environment.

At the time of the incident, the operational status of the wastewater treatment system was excellent. Based on this operational data, the assumption was made that the treatment system could effectively handle the influent wastewater associated with the upset. However, laboratory analysis of the Outfall 003 composite sample for February 23, 1986 shows that the system was incapable of handling the quantity of ammonia received in the wastewater treatment plant influent during the upset. The quantity of ammonia discharged from Outfall 003 on that date was 668.4 pounds (measured as $\text{NH}_3\text{-N}$), an exceedance of the NPDES daily maximum discharge limitation.

Should you require more information regarding this upset and/or its resulting effects, please contact me at (409) 962-4421 so we might discuss the matter.

Sincerely,

James C. Makon

for
Michael P. Pitre
Environmental Specialist

MPP:am

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MAR 03 1986

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